

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE:	§	
	§	
RICHLAND RESOURCES	§	CASE NO. 13-42921
CORPORATION	§	
d/b/a Richland International Resources	§	
Corporation,	§	
MANEK ENERGY PRESSURE	§	CASE NO. 13-42922
PUMPING, LLC,	§	
MANEK ENERGY HOLDINGS, INC. &	§	CASE NO. 13-42924
RICHLAND RESOURCES CORP.	§	
d/b/a RRCH Corp.	§	CASE NO. 13-42925
	§	
Debtors.	§	

AGREED MOTION FOR FURTHER CONTINUANCE

TO THE HONORABLE BRENDA T. RHOADES, UNITED STATES BANKRUPTCY CHIEF JUDGE:

C&J SPEC-RENT SERVICES, INC. and CASEDHOLE SOLUTIONS, INC. (the “Movants”) file this *Agreed Motion for Further Continuance* (“Motion for Continuance”) and would show the Court as follows:

I.

The following matter in the above-styled and numbered causes (the “Bankruptcy Cases”) is currently scheduled for hearing on Tuesday, May 20, 2014 at 9:30 a.m. (CDT), at the United States Bankruptcy Court, Suite 300B, 660 North Central Expressway, Plano, Texas 75074:

- a) *Motion of C&J Spec-Rent Services, Inc. and Casedhole Solutions, Inc. for (i) a Determination that the Automatic Stay Does Not Prohibit Severance Of Certain Claims Asserted in State-Court Lawsuit, or (ii) in the Alternative, for Relief from Stay Under Bankruptcy Code § 362(d)(1) to Permit the State Court to Sever and Adjudicate Such Claims and Request for a Hearing in Plano, Texas* [Case No. 13-42921, D.I. 54] [Case No. 13-42924, D.I. 29] [Case No. 13-42922, D.I. 32] [Case No. 13-42925, D.I. 105] (the “Motion” or, collectively, the “Motions”).

Amerril Energy LLC (“Amerril”) objected to the Motions in all the Bankruptcy Cases. Jason R. Searcy (the “Chapter 11 Trustee”), the Chapter 11 Trustee appointed in the bankruptcy case styled *In re Richland Resources Corp. d/b/a RRCH*, Case No. 13-42925 (the “RRCH Bankruptcy Case”), objected to the Motion in the RRCH Bankruptcy Case. Certain other parties besides Amerril and the Chapter 11

Trustee also objected to the Motion in the RRCH Bankruptcy Case and/or joined the Chapter 11 Trustee's objection.

II.

The Movants, the Chapter 11 Trustee, and Amerril have agreed to request a continuance of the May 20, 2014 setting on the Motions in the Bankruptcy Cases. The Chapter 11 Trustee has informed the Movants that he, Amerril, Steadfast Resources, LLC, and Sun Delta Inc. have reached a settlement in principle of their dispute in the adversary proceeding styled *Richland Resources Corp. v. Steadfast Resources, LLC*, et al., Adv. Proc. No. 14-04004 (the "Lawsuit"). Those parties to that Lawsuit intend to file a motion (the "9019 Motion") in the RRCH Bankruptcy Case under Rule 9019 of the Federal Rules of Bankruptcy Procedure ("FRBP") to approve this settlement. If approved, this settlement will impact the Motions and the relief that the Movants have requested. For these reasons, the Movants request that the hearing on the Motions be rescheduled for the same date and time as the hearing to be scheduled on the 9019 Motion once the 9019 Motion has been filed. This Motion for Continuance is not made for purposes of delay, but rather in order that the 9019 Motion and the Motions be heard at the same time and that the interests of justice and judicial efficiency be served.

WHEREFORE PREMISES CONSIDERED, the Movants pray for an Order of this Court continuing the aforementioned hearing from its current setting of May 20, 2014 and rescheduling the hearing on the Motions for the same date and time as the hearing on the 9019 Motion once it is filed, and for such other and further relief as the Court deems just and proper.

Date: May 15, 2014.

Respectfully submitted,

LOCKE LORD LLP

By: /s/ W. Steven Bryant

W. Steven Bryant

State Bar No. 24027413

Federal I.D. No. 32913

Daniel J. Pettit

State Bar No. 24046626

600 Travis Street, Suite 2800

Houston, Texas 77002

Phone: (713) 226-1489

Fax: (713) 229-2536

sbryant@lockelord.com

ATTORNEYS FOR C&J SPEC-RENT
SERVICES, INC. and CASEDHOLE
SOLUTIONS, INC.

CERTIFICATE OF SERVICE

I, the undersigned, certify that a true and correct copy of the foregoing *Motion* (i) was mailed, by first U.S. class mail, postage paid, to Susan Jacks, Mehaffy Weber, 500 Dallas, Ste. 1200, Houston, TX 77002 and Jason R. Searcy, Searcy & Searcy, P.C., 446 Forest Square, Longview, Texas 75605 and (ii) was served by electronic notice on all parties requesting such notice under the ECF system for the Eastern District of Texas, on this the 15th day of May, 2014.

/s/ W. Steven Bryant

W. Steven Bryant